

BRADLEY S. MAINOR, ESQ.  
Nevada Bar No. 7434  
ADAM ELLIS, ESQ.  
Nevada Bar No. 14514  
**MAINOR ELLIS, LLP**  
8367 W. Flamingo Road, Suite 200  
Las Vegas, Nevada 89147  
Phone: (702) 450-5000  
Fax: (702) 733-1106  
*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

RONALD OTIS BOYD II, an individual;

Plaintiff,

vs.

MB PROSOUND AND STAGING, INC., a  
Foreign Corporation; DOE DEFENDANTS I  
– XX, inclusive; DOE MB PROSOUND  
EMPLOYEES I – XX; and ROE  
CORPORATIONS I – XX, inclusive,

Defendants.

Case No.: 2:23-cv-02092-APG-MDC

**STIPULATED DISCOVERY PLAN AND  
[PROPOSED] SCHEDULING ORDER**

**SUBMITTED IN COMPLIANCE WITH  
LR 26-1(B)**

Plaintiff, RONALD OTIS BOYD II, by and through his attorneys of record, BRADLEY S. MAINOR, ESQ. and ADAM ELLIS, ESQ. of MAINOR ELLIS, LLP, and Defendant MB PROSOUND AND STAGING, INC. by and through its attorneys of record, TAYLOR BUONO, ESQ. of WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP, hereby submit their Stipulated Discovery Plan and Scheduling Order pursuant to Fed R. Civ. P. 26(f) and Local Rules 26-1(b).

The Parties jointly request that the Court: 1) approve this plan, and 2) implement the plan as a scheduling order.

The FRCP 26(f) conference was held on January 12, 2024, by Adam Ellis, Esq. for Plaintiff, and Taylor Buono, Esq. for Defendant. The parties will serve their Initial Disclosures on January

26, 2024. The Parties propose the following discovery plan:

**I. ESTIMATED TIME REQUIRED FOR DISCOVERY:**

**a. Date of Defendants' Answer or Appearance (LR 26-1(b)(1)):**

Plaintiff filed his Complaint and Demand for Jury Trial on September 12, 2023 in the Eighth Judicial District Court for Clark County, Nevada. Defendant filed its Answer to Plaintiff's Complaint on November 7, 2023 in the Eighth Judicial District Court for Clark County, Nevada. Subsequently, this matter was removed from the Eighth Judicial District Court to the United States District Court, District of Nevada, on December 20, 2023. (ECF No. 1).

**b. Proposed Discovery Cut-Off (LR 26-1(b)(1)):**

Accordingly, the parties have agreed that 180 days is needed to complete discovery. Discovery will close 180 days from January 12, 2024. Accordingly, all discovery must be completed no later than: **July 10, 2024**. The parties may conduct discovery within the scope of Fed. R. Civ. P. 26(b). Subject to the foregoing, discovery need not be limited or focused on particular issues or conducted in phases.

**II. AMENDING THE PLEADINGS AND ADDING PARTIES (LR 26-1(b)(2)):**

Motions to amend pleadings and add parties shall be filed no later than ninety (90) days before the close of discovery: **April 11, 2024**.

**III. DISCLOSURES (Fed. R. Civ. P. 26(f)(3)(A); LR 26-1(b)(3)):**

**a. Initial Expert Disclosures:**

Pursuant to FRCP 26(a)(2)(D)(i), initial expert disclosures shall be due no later than sixty (60) days before the close of discovery: **April 11, 2024**.

**b. Rebuttal Expert Disclosures:**

Pursuant to FRCP 26(a)(2)(D)(ii), rebuttal expert disclosures shall be due no later than thirty (30) days before the close of discovery: **June 10, 2024**.

**IV. DISPOSITIVE MOTIONS (LR 26-1(b)(4)):**

The deadline for filing dispositive motions shall be thirty (30) days after the close of discovery: **August 9, 2024**.

**V. JOINT PRE-TRIAL ORDER (LR 26-1(b)(5), (6)):**

If no dispositive motions are filed, and unless otherwise ordered by this Court, the joint pre-trial order shall be filed no later than thirty (30) days after the date set for filing dispositive motions: **September 9, 2024**. The joint pre-trial order shall include the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections to them.

In the event a dispositive motion is timely filed, the date for filing the joint pre-trial order shall be suspended until thirty (30) days after the Court enters a ruling on the dispositive motion, or otherwise by further Court order.

**VI. ALTERNATIVE DISPUTE RESOLUTION (LR 26-1(b)(7)):**

The parties certify that they met and conferred about the possibility of using alternative dispute resolution processes including mediation and arbitration. While the parties are open to various means of resolution, they agree additional discovery must be obtained prior to scheduling any kind of alternative dispute resolution. Counsel further agree that a settlement conference will be beneficial after discovery is concluded.

**VII. ALTERNATIVE FORMS OF CASE DISPOSITION (LR 26-1(b)(8)):**

The parties hereby certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73, use of the Short Trial Program (General Order 2013-01). The parties do not consent to those forms of dispute resolution at this time.

**VIII. ELECTRONIC EVIDENCE (LR 26-1(b)(9)):**

The parties hereby certify that they met and conferred regarding their intentions to present evidence in electronic format to jurors for the purposes of jury deliberations. The parties did not come to any stipulations regarding providing discovery in an electronic format.

///

///

///

2:23-cv-02092 Discovery Plan

DATED January 23, 2024.

DATED January 23, 2024.

**MAINOR ELLIS, LLP**

**WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER, LLP**

*/s/ Adam Ellis*

*/s/ Taylor A. Buono*

BRADLEY S. MAINOR, ESQ.

MARK C. SEVERINO, ESQ.

Nevada Bar No. 7434

Nevada Bar No. 14117

ADAM ELLIS, ESQ.

TAYLOR A. BUONO, ESQ.

Nevada Bar No. 14514

Nevada Bar No. 15513

8367 W. Flamingo Road, Suite 200

6689 Las Vegas Blvd. South, Suite

Las Vegas, NV 89147

Las Vegas, NV 89119

*Attorneys for Plaintiff*

*Attorneys for Defendant*

**IT IS SO ORDERED.**

Reviewed for special scheduling.  
The standard discovery period  
under LR 26(b)(1) is triggered by  
date the first defendant answers or  
appears and not from the date of  
the Rule 26(f) conference.

UNITED STATES MAGISTRATE JUDGE

DATED: 1-25-2024